

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

V.

VICENTE CASTRO TAVERAS

Defendant.

CRIMINAL NO. 02-266-04 (SEC)

MOTION REQUESTING AMENDMENT OF THE ORDER AT DOCKET ENTRY 695
AND REQUEST FOR ORDER ADDRESSED TO THE PROSECUTION ON
PRODUCTION OF DOCUMENTS ORDERED BY THE COURT

TO THE HONORABLE SALVADOR E. CASELLAS, SENIOR U. S. DISTRICT JUDGE:

Comes now the above-captioned defendant through his undersigned counsel and respectfully states and prays:

1. Upon review of the Court's order entered on December 5, 2016 at docket entry 695 (no document attached) and the original Coram Nobis Petition, particularly at page 2, paragraph #4, Mr. Vicente Castro respectfully submits that attorney Frank Inserni should not be counsel for defendant because he became a witness for the defense once he asserted that "his best recollection of the negotiations and representations to Mr. Taveras (Castro Taveras) as his counsel was that a sentence of probation granted if he cooperated would not affect his status as a resident of the United States".

2. In light of the above, Mr. Castro respectfully prays that the order stating that Mr. Castro be represented by Frank Inserni be amended so as to reflect that he will be represented by undersigned counsel who is already on record as counsel for defendant.

3. With regards to the order to the prosecution on "submitting the transcript presented on appeal as well as all other evidence it deems relevant for purposes of the hearing required by the

first circuit”, Mr. Vicente Castro Taveras respectfully prays that the Honorable court order that any and all documents to be submitted by the prosecution in compliance with the Court’s order be produced by e-mail to undersigned counsel no later than December 23, 2016.

WHEREFORE, pursuant to his right to due process and assistance of counsel guaranteed by the Fifth and Sixth Amendments to the Constitution of the United States and the provisions of rules 2 and 16 of the Federal rules of Criminal Procedure and rule 102 of the Federal rules of Evidence, Mr. Vicente Castro Taveras respectfully prays that the two remedies sought above be granted.

RESPECTFULLY SUBMITTED in San Juan, Puerto Rico, this 14th day of December, 2016.

I hereby certify having filed this motion on this day through the Honorable Court’s CM/ECF Filing system, which will notify all pertinent parties to this matter.

S/ Rossana M. De-Castro-González

Rossana M. De-Castro-González
USDC-PR BAR NUMBER: 210711

P.O. Box 361825, San Juan, PR 00936-1825
787-767-1661; Fax: 787-754-8221
Email: rossanadecastro@gmail.com